

KARDARAS & KELLEHER LLP

44 Wall Street

New York, NY 10005

(212) 785-5050

Attorneys for Defendant

SHENZHEN HIGH POWER

TECHNOLOGY CO. LTD.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ENERGIZER S.A.,

Plaintiff, : 07 CV 7406 (LTS)

Against : ECF CASE

M/V YM GREEN her engines, boilers and :  
Tackle *in rem*; YANG MING MARINE :  
TRANSPORT CORP.; YANGMING (UK) LTD.; :  
ALL OCEANS TRANSPORTATION INC.; :  
KAWASAKI KISEN KAISHA LTD.; CONTERM :  
HONG KONG LTD.; VANGUARD LOGISTICS :  
SERVICES HONG KONG LTD.; :  
FIEGE GOTHS CO., LTD.; and SHENZHEN :  
HIGH POWER TECHNOLOGY CO. LTD. :

Defendants. :

-----X

Defendant SHENZHEN HIGH POWER TECHNOLOGY CO. LTD. ("High Power"), by its attorneys Kardaras & Kelleher LLP, as and for its answer to cross-claim of defendants Conterm Hong Kong Ltd. ("Conterm") and Vanguard Logistics Services Hong Kong Ltd. ("Vanguard") contained in their amended answer to plaintiff's complaint, alleges upon information and belief as follows:

1. Denies the allegations contained in paragraphs 28 and 29 of the cross-claim of defendants Conterm and Vanguard insofar as it refers to defendant High Power, and denies

knowledge and information sufficient to form a belief as to any of the allegations as to the remaining defendants.

**AS AND FOR A FIRST AFFIRMATIVE DEFENSE**

2. Defendant High Power claims the benefit of all defenses raised by co-defendants and plaintiff in its response to cross-claims and counterclaims as well as its defenses set forth in its answer to plaintiff's complaint insofar as said defenses may be applicable to defendant High Power.

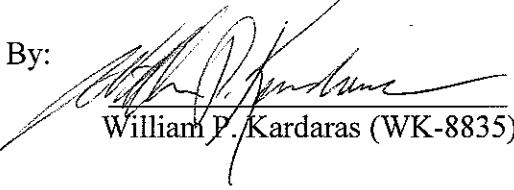
WHEREFORE, Defendant High Power prays that the cross-claim of defendants Conterm and Vanguard be dismissed with prejudice, together with costs, disbursements and attorney's fees and for such other and additional relief as to the Court may seem just and proper.

Dated: New York, NY  
February 28, 2008

Respectfully submitted,

KARDARAS & KELLEHER, LLP  
44 Wall Street  
New York, NY 10005  
Attorneys for Defendant  
SHENZHEN HIGH POWER  
TECHNOLOGY CO. LTD.

By:

  
William P. Kardaras (WK-8835)

To: HILL RIVKINS & HAYDEN LLP  
Attorneys for Plaintiff  
45 Broadway, Suite 1500  
New York, NY 10006

CICHANOWICZ CALLAN KEANE  
VENGROW & TEXTOR LLP  
Attorneys for Defendants  
YANG MING MARINE TRANSPORT CORP.,  
YANGMING (UK) LTD. and  
ALL OCEANS TRANSPORTATION, INC.  
61 Broadway, Suite 3000  
New York, NY 10006

MAHONEY & KEANE  
Attorneys for Defendant  
KAWASAKI KISEN KAISHA LTD.  
111 Broadway, 10<sup>th</sup> floor  
New York, NY 10006

DOUGHERTY RYAN GIUFFRA  
ZAMBITO & HESSION  
Attorneys for Defendant  
CONTERM HONG KONG LTD. and  
VANGUARD LOGISTICS SERVICES HONG KONG LTD.  
313 E. 38<sup>th</sup> Street  
New York, NY 10016

LENNON MURPHY & LENNON  
Attorneys for Defendant  
FIEGE GOTH CO. LTD.  
The Greybar Building  
420 Lexington Ave., Suite 300  
New York, NY 10170

**CERTIFICATE OF SERVICE BY REGULAR U.S. MAIL AND BY ECF**

The undersigned declares under penalty of perjury that the following is true and correct:

1. I am over the age of eighteen years and I am not a party to this action.
2. On February 28, 2008, I served a complete copy of SHENZHEN HIGH POWER TECHNOLOGY CO. LTD.'s Answer to Cross-Claim of Defendants Conterm Hong Kong Ltd. and Vanguard Logistics Services Hong Kong Ltd. by regular U.S. mail and/or by ECF, to the following attorneys at their respective ECF registered address and/or at the following address:

HILL RIVKINS & HAYDEN LLP  
Attorneys for Plaintiff  
45 Broadway, Suite 1500  
New York, NY 10006

CICHANOWICZ CALLAN KEANE  
VENGROW & TEXTOR LLP  
Attorneys for Defendants  
YANG MING MARINE TRANSPORT CORP.,  
YANGMING (UK) LTD. and  
ALL OCEANS TRANSPORTATION, INC.  
61 Broadway, Suite 3000  
New York, NY 10006

MAHONEY & KEANE  
Attorneys for Defendant  
KAWASAKI KISEN KAISHA LTD.  
111 Broadway, 10<sup>th</sup> floor  
New York, NY 10006

DOUGHERTY RYAN GIUFFRA  
ZAMBITO & HESSION  
Attorneys for Defendant  
CONTERM HONG KONG LTD. and  
VANGUARD LOGISTICS SERVICES HONG KONG LTD.  
313 E. 38<sup>th</sup> Street  
New York, NY 10016

LENNON MURPHY & LENNON  
Attorneys for Defendant  
FIEGE GOTH CO. LTD.  
The Greybar Building  
420 Lexington Ave., Suite 300  
New York, NY 10170

Dated: New York, New York  
February 28, 2008

*Dorothy A. Donnelly*  
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